



EPSTEIN DRANGEL LLP

60 East 42nd Street, Suite 1250, New York, NY 10165

T: 212.292.5390 • E: mail@ipcounselors.com

www.ipcounselors.com

 USDC SDNY
 DOCUMENT
 ELECTRONICALLY FILED
 DOC #: _____
 DATE FILED: 2/14/2025

MEMORANDUM ENDORSED

February 14, 2025

VIA ECF

Hon. Gregory H. Woods
 United States District Judge
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street
 New York, New York 10007

Re: *Loewe, S.A. v. Beijing Onward Fashion Co., Ltd., et al.*
Case No. 24-cv-8871 (GHW)
Request for to Modify Airwallex's Motion Briefing Schedule

Dear Judge Woods,

We represent Plaintiff Loewe, S.A. (“Plaintiff”), in the above-referenced matter (the “Action”).¹ On February 5, 2025, Financial Institution Airwallex Hong Kong Limited (“Airwallex”) filed a Motion for Fees and Costs (“Airwallex Motion”) (Dkts. 32-35). Thereafter, by Order dated February 10, 2025, the Court set forth a briefing schedule for Airwallex’s Motion. (Dkt. 37). Counsel for Plaintiff and counsel for Airwallex are in the process of discussing reaching an amicable resolution without the need for further judicial intervention but require additional time to complete our discussions. Accordingly, Plaintiff respectfully requests that the Court modify the briefing schedule on Airwallex’s Motion, and in accordance with Your Honor’s Individual Rules of Practice, respectfully submits the following:

1. **Original due date:** Plaintiff’s deadline to file its opposition to the Airwallex Motion is February 21, 2025. Airwallex’s deadline to file its reply, if any, is within seven (7) days of Plaintiff’s opposition.
2. **The number of previous requests for extension:** None, this is Plaintiff and Airwallex’s first request for an extension of the briefing schedule for Airwallex’s Motion.
3. **The reason for the current request:** Plaintiff’s counsel and Airwallex’s counsel are engaging in productive discussions to amicably resolve the issues set forth in Airwallex’s Motion. Accordingly, Plaintiff and Airwallex respectfully request an extension of time to continue such discussions and avoid wasting the Court’s time and judicial resources.
4. **Whether the adversary consents:** Airwallex consents to Plaintiff’s instant request.
5. **Proposed alternative dates:** Plaintiff and Airwallex propose extending the deadlines by two (2) weeks, *i.e.*, making Plaintiff’s deadline to file its opposition is February 21, 2025 and Airwallex’s deadline to file its response is within seven (7) days of Plaintiff’s opposition.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaint.

Hon. Gregory H. Woods
February 14, 2025
Page 2 of 2

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Danielle S. Futterman
Danielle S. Futterman (DY 4228)
dfutterman@ipcounselors.com
60 East 42nd Street, Suite 1250
New York, NY 10165
Telephone: (212) 292-5390
Facsimile: (212) 292-5391
Attorneys for Plaintiff

Application granted. Plaintiff's application for an extension of time to file its opposition to the motion for fees and costs filed by Airwallex Hong Kong Limited ("Airwallex"), Dkt. No. 39, is granted. Plaintiff's opposition is due no later than March 7, 2025; AirWallex's reply, if any, is due within seven days after service of Plaintiff's opposition. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 39.

SO ORDERED.

Dated: February 14, 2025
New York, New York



GREGORY H. WOODS
United States District Judge